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*Counsel for Defendant
Equifax Information Services LLC*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

MELISSA JEAN COLEMAN,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC,

Defendant.

Case No.: 2:24-cv-00398-ART-DJA

**STIPULATION REGARDING EQUIFAX'S MOTION FOR PROTECTIVE
ORDER, DOCUMENT NO. 14 AND PLAINTIFF'S MOTIONS TO COMPEL
PRODUCTION, DOCUMENT NOS. 17 AND 19, AND MOTION TO COMPEL
FURTHER ANSWERS DOCUMENT NO. 18**

Defendant Equifax Information Services LLC ("Equifax"), by and through its counsel of record, and Plaintiff Melissa Coleman ("Plaintiff") (jointly the "Parties") stipulate that Plaintiff's Motions to Compel Production, filed as Document Nos. 17 and 19, have been resolved entirely by agreement, and Plaintiff's Motion to Compel Further Answers to Interrogatories, Document No. 18, has been resolved in part, (collectively, the "Motions"). The Parties also stipulate that Equifax withdraws its Motion for Protective Order at Document No. 14, without prejudice to refileing.

1 The only remaining dispute between the parties is the contents of Supplemental Responses
 2 to Plaintiff's Interrogatory 12 and Interrogatory 13. In support of this Stipulation, the Parties state
 3 as follows:

4 1. On August 21, 2024, Equifax filed a Motion for Protective Order regarding
 5 Plaintiff's proposed 30(b)(6) topics ("Equifax's Motion Dkt. 14").

6 2. On August 26, 2024, Plaintiff filed a Motion to Compel Production to Plaintiff's
 7 Requests for Production 1,2,10,16,18-23,35,37,38,43,44,53,54,135, and 136 ("Plaintiff's Motion
 8 Dkt. 17").

9 3. On August 26, 2024, Plaintiff filed a Motion to Compel Further Answers to
 10 Plaintiff's Requests for Interrogatories ("Plaintiff's Motion Dkt. 18").

11 4. On August 26, 2024, Plaintiff filed a Motion to Compel Production to Plaintiff's
 12 Requests for Production 3-7, 11-14, 26,28,29,123, 124, and 126-129 ("Plaintiff's Motion Dkt.
 13 19").

14 5. On August 27, 2024, Plaintiff filed a Motion for Protective Order ("Plaintiff's
 15 Motion Dkt. 21").

16 6. On September 16, 2024, Plaintiff served Proposed Amendments/Changes to
 17 30(b)(6) Topics based on the previously completed meet and confer and Equifax's Motion at Dkt.
 18 14.

19 7. On September 16, 2024, the Parties met and conferred regarding all of the above
 20 referenced motions.

21 **I. Plaintiff's Motions at Document Nos. 17 and 19:**

22 8. The Parties have reached an agreed resolution as to Plaintiff's Requests for
 23 Production 1, 2, 10, 16, 18-23, 35, 37, 38, 43, 44, 54, 135 and 136. Equifax has agreed to produce
 24 the agreed upon documents within fourteen days.

25 9. The Parties have reached an agreed resolution as to Plaintiff's Requests for
 26 Production 3-7, 11-14, 26, 28, 29, 123, 124, and 126-129. Equifax has agreed to produce the agreed
 27 upon documents within fourteen days.

1 10. The Parties therefore request that the hearing regarding Plaintiff's Motions filed as
2 Documents 17 and 19 be adjourned, and that all related deadlines be vacated.

3 **II. Plaintiff's Motion at Document No. 18:**

4 11. The Parties have reached an agreement regarding Plaintiff's Interrogatories 1
5 through 10. Equifax agreed to produce supplemental verified interrogatory responses within 14
6 days pursuant to the Parties agreement.

7 12. The Parties did not reach an agreement regarding Plaintiff's Interrogatory number
8 12 and 13, although the Parties are continuing to meet and confer regarding the same.

9 13. The Parties agreed to an additional 7 day extension of time for Equifax to file a
10 Response to Plaintiff's Motion to Compel, at Document Number 18 so that the Parties can complete
11 a final meet and confer in an effort to reach an agreement to Interrogatory Number 12 and 13.

12 14. Absent an agreement, Equifax will file a Response to Plaintiff's Motion at Docket
13 Number 18, by September 26, 2024.

14 **III. Equifax's Motion for Protective Order at Document No. 14:**

15 15. On September 16, 2024, Plaintiff served proposed amendments and changes to the
16 30(b)(6) topics at issue in Equifax's Motion for Protective Order. The Parties are actively engaged
17 in a meet and confer regarding the newly served modified topics.

18 16. Equifax therefore withdraws its Motion for Protective Order, at Document No. 14,
19 without prejudice to refiling.

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1 WHEREFORE, the Parties agree that Equifax will make a supplemental document
2 production within 14 days, that the hearing regarding Plaintiff's Motion at 17 and 19 be
3 adjourned, and that Equifax will have until September 26, 2024 to file a Response to Plaintiff's
4 Motion filed at Document 18.

5 Respectfully submitted this 19th day of September, 2024.

6 MELISSA J. COLEMAN

SEYFARTH SHAW LLP

7 By: /s/ Melissa J. Coleman

By: /s/ Jennifer R. Brooks

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9 Melissa J. Coleman
10 620 Harvester Course Drive
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12 *Plaintiff*

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Counsel for Defendant
Equifax Information Services LLC

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19 **IT IS THEREFORE ORDERED** that the parties' stipulation (ECF No. 32) is **granted**.

20 **IT IS FURTHER ORDERED** that Plaintiff's motions to compel (ECF Nos. 17 and 19) are
21 **denied as moot.**

22 **IT IS FURTHER ORDERED** that Defendant's motion for protective order (ECF No. 14) is
23 **denied as moot.**

24 **IT IS FURTHER ORDERED** that Defendant shall have until September 26, 2024, to file a
25 response to Plaintiff's motion to compel (ECF No. 18).

26 **IT IS FURTHER ORDERED** that the hearing scheduled for October 29, 2024, at 10:00 am is
27 **vacated.**

28 **IT IS FURTHER ORDERED** that, given Plaintiff's representation in the parties' prior
stipulation for an extension of time (ECF No. 27) that she intended to withdraw her motion for a
protective order (ECF No. 21), the motion for protective order (ECF No. 21) is **denied as moot.**

DATED: September 20, 2024


DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2024, I presented the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

A copy has also been sent via U.S. Mail and email to the following:

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/s/ Nicholas DiMattei, Jr.
An employee of CLARK HILL PLLC